

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

Christopher Smith,

Plaintiff,

v.

Moss Law Firm,

Defendant.

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Case No. 3:18-cv-2449-D

**AGREED MOTION TO CONTINUE TRIAL**

Plaintiff, Christopher Smith (“Plaintiff”), through Undersigned Counsel, moves the Court to continue trial to 30 days. Plaintiff states as follows in support of this agreed Motion:

1. Trial was originally set in this case for April 20, 2020. (Doc. 18.)
2. Due to the Coronavirus disease, the Court reset the trial date to August 24, 2020. (Doc. 33.)
3. Based on the Court’s Original Trial Setting Order and the Resetting Order, the following are the pending deadlines in this case:
  - a. Pretrial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) are due on July 25, 2020.

- b. Objections to pretrial disclosures are due on August 10, 2010.
- c. Voir dire questions are due on August 10, 2010.
- d. Motions in limine are due on August 10, 2010.
- e. A proposed pretrial order is due August 10, 2020.
- f. Trial Materials, including exchange of witness lists, exhibits, and deposition excerpts are due on August 10, 2020.
- g. A pretrial conference is to be held on August 17, 2020.
- h. Responses to motions in limine is due on August 17, 2010.
- i. The case is set for jury trial on August 24, 2020 at 9 AM.

4. Plaintiff's Counsel has recently become aware of an unanticipated issue that may affect the status of the case, which requires additional time to address. As such, Plaintiff is requesting this continuance as early as possible so as not to interfere with the Court's and Defendant's schedule.

5. Plaintiff has conferred with Defendant's Counsel who has advised Plaintiff's Counsel that the request is unopposed.

6. This is the first request for an extension of trial filed by Plaintiff.

7. No party will be prejudiced by a continuance of the deadlines in this matter, and Plaintiff respectfully requests that the Court grant this agreed Motion.

WHEREFORE, the Defendant respectfully requests this Court enter an order granting this Motion for continuance of all pretrial and trial deadlines to 30 days, up to September 23, 2020.

Dated: June 11, 2010

Respectfully submitted,

By: /s/ Ramona Ladwig  
Ramona V. Ladwig  
State Bar No. 24092659  
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*Attorney for Plaintiff*

### **CERTIFICATE OF CONFERENCE**

I hereby certify that I conferred with opposing counsel regarding the merits of this Motion and he advised me that he is unopposed.

By: /s/ Ramona V. Ladwig  
Ramona V. Ladwig

### **CERTIFICATE OF SERVICE**

On June 11, 2020, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, Dallas Division, using the electronic case filing system of the court. I hereby certify that all parties were served via electronic case filing, email, or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2) or the local rules.

By: /s/ Ramona V. Ladwig  
Ramona V. Ladwig